

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

UNITED STATES OF AMERICA,)	INDICTMENT	CR11-371 ADM/TNL
)		
Plaintiff,)	(18 U.S.C. § 853(p)	
)	(18 U.S.C. § 2251(a))	
v.)	(18 U.S.C. § 2251(b))	
)	(18 U.S.C. § 2251(e))	
MICHAEL WILLIAM SHERMAN,)	(18 U.S.C. § 2252(a)(4)(B))	
)	(18 U.S.C. § 2253(a))	
Defendant.)		

THE UNITED STATES GRAND JURY CHARGES THAT:

COUNT 1

(Production of Child Pornography)

From in or about September 2010 through in or about January 2011, in the State and District of Minnesota, the defendant,

MICHAEL WILLIAM SHERMAN,

did knowingly employ, use, persuade, induce, entice, and coerce John Doe #1, a minor child, to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, which visual depiction was produced using materials that had been mailed, shipped, and transported in interstate and foreign commerce by any means, including, but not limited to, the following video files 7212.mp4; 7243.mp4; 7244.mp4; and 7251.mp4; in violation of Title 18, United States Code, Sections 2251(a) and (e).

THE UNITED STATES GRAND JURY CHARGES THAT:

COUNT 2

(Production of Child Pornography)

From in or about September 2010 through in or about January 2011, in the State and District of Minnesota, the defendant,

SCANNED

DEC 06 2011

U.S. DISTRICT COURT ST. PAUL

FILED DEC 05 2011
RICHARD D. SLETTEN, CLERK
JUDGMENT ENTD _____
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MICHAEL WILLIAM SHERMAN,

did knowingly employ, use, persuade, induce, entice, and coerce Jane Doe #1, a minor child, to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, which visual depiction was produced using materials that had been mailed, shipped, and transported in interstate and foreign commerce by any means, including, but not limited to, the following image files 660701.jpg; 660702.jpg and 660703.jpg; in violation of Title 18, United States Code, Sections 2251(a) and (e).

COUNT 3

(Possession of Child Pornography)

On or about January 14, 2011, in the State and District of Minnesota, the defendant,

MICHAEL WILLIAM SHERMAN,

did knowingly possess one or more matters that contained a visual depiction of child pornography, that had been mailed, shipped and transported in interstate and foreign commerce by any means, including by computer, and that was produced using materials that had been mailed, and shipped and transported in interstate and foreign commerce by any means, including by computer, where the production of such visual depiction involved the use of a minor engaging in sexually explicit conduct and such visual depiction was of such conduct, including, but not limited to, the following computer image files: 574022.jpg; 574055.jpg; 467886.bmp;

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574056.jpg; and 140511.avi; in violation of Title 18, United States Code, Sections 2252(a)(4)(B) and 2252(b)(1).

FORFEITURE ALLEGATIONS

Counts 1 through 3 of this Indictment are hereby re-alleged and incorporated as if fully set forth herein by reference, for the purpose of alleging forfeitures pursuant to Title 18, United States Code, Section 2253(a).

As a result of the foregoing offenses, the defendant shall forfeit to the United States pursuant to Title 18, United States Code, Section 2253(a):

(1) any visual depiction described in section 2251, 2251A, 2252, or 2260 of this chapter, or any book, magazine, periodical, film, videotape, or other matter which contains any such visual depiction, which was produced, transported, mailed, shipped or received in violation of this chapter;

(2) any property, real or personal, constituting or traceable to gross profits or other proceeds obtained from such offense; and

(3) any property, real or personal, used or intended to be used to commit or to promote the commission of such offense or any property traceable to such property, including a computer.

If any of the above-described forfeitable property is unavailable for forfeiture, the United States intends to seek the forfeiture of substitute property as provided for in Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Section 2253(b).

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All in violation of Title 18, United States Code, Sections
2251(a) and (e).

A TRUE BILL

UNITED STATES ATTORNEY

FOREPERSON